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8
9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12
13 **MICHAEL FREEMAN,**

14 Plaintiff,

15 v.

16 **R. JAIME-DAUMY,**

17 Defendant.
18

Case No. 3:20-cv-05382-TLT (PR)

**STIPULATION FOR VOLUNTARY
DISMISSAL WITH PREJUDICE
(Fed. R. Civ. P. 41(a)(1)(A)(ii));
~~PROPOSED~~ ORDER AS MODIFIED**

19 Plaintiff Michael Freeman and Defendant R. Jaime-Daumy have resolved this case in its
20 entirety. Therefore, the parties stipulate to a dismissal of this action with prejudice under Federal
21 Rule of Civil Procedure 41(a)(1)(A)(ii). The Court shall retain jurisdiction for purposes of
22 enforcing the settlement agreement.

23 Each party shall bear its own litigation costs and attorney's fees.

24 IT IS SO STIPULATED.
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Dated: June 14, 2023 /s/ Stanley Goff
Stanley Goff
Attorney for Plaintiff Michael Freeman

Dated: June 14, 2023 /s/ C. Hay-Mie Cho
C. Hay-Mie Cho
Deputy Attorney General
California Attorney General's Office
Attorney for Defendant R. Jaime-Daumy

SIGNATURE ATTESTATION

Pursuant to General Order 45, Section X.B., I attest that I have obtained consent to file for all signatures indicated by the mark "/s/" within this electronically filed document.

/s/ C. Hay-Mie Cho
C. HAY-MIE CHO
Attorney for Defendant R. Jaime-Daumy

ORDER

PURSUANT TO STIPULATION, IT IS ORDERED:

Plaintiff's complaint is dismissed in its entirety with prejudice. This Court will retain jurisdiction for purposes of enforcing the settlement agreement. Each side shall bear its own attorneys' fees and costs. **The parties shall have 60 days to comply with the terms of the settlement agreement.**

Dated: June 14, 2023 
TRINA THOMPSON
UNITED STATES DISTRICT JUDGE

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